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February 11, 2025

VIA PACER

Hon. José R. Almonte, U.S.M.J.
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, New Jersey 07102

**RE: Eric Lunsford v. Rutgers University, et al.
Case No. 2:24-cv-04359-JXN-JRA**

Dear Magistrate Judge Almonte:

This office represents Defendants, Rutgers University (pled as “Rutgers University d/b/a University Correctional Healthcare”) (“Rutgers”) and Barrington Lynch, M.D. (“Dr. Lynch”) in the above-captioned matter. With the consent of Plaintiff’s counsel, we respectfully submit this joint request for a 45-day extension of the current fact discovery deadline, which is presently set to close on February 26, 2025. This extension is necessary to accommodate the scheduling and completion of three anticipated depositions to be taken by Plaintiff’s counsel: (1) Dr. Lynch, (2) a non-party nurse whom we do not currently represent and have not been able to reach, and (3) a Rule 30(b)(6) witness for Rutgers.

Regarding the 30(b)(6) deposition, we have conferred with Plaintiff’s counsel, and she is in the process of providing us with a revised notice specifying the topics of examination, which will enable us to designate an appropriate witness. Additionally, the individual we expect may serve as Rutgers’ 30(b)(6) designee is currently on medical leave, and we are waiting to hear about his return date. Accordingly, additional time is required to determine the appropriate representative for this deposition.

In light of the foregoing, we further request, with Plaintiff’s consent, a corresponding 45-day adjournment of the settlement conference currently scheduled for March 10, 2025. This adjournment will allow the parties to complete the depositions and approach the settlement conference with a more developed factual record.

We appreciate the Court’s attention to this matter and thank Your Honor for considering this request.

Respectfully submitted,

NORRIS McLAUGHLIN, P.A.

/s/ Margaret Raymond-Flood
Margaret Raymond-Flood, Esq.

cc: Kaitlin McCaffrey, Esq., Esq. (via PACER)



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